



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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December 27, 2019

**Via ECF**

Honorable John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Biehner v. City of N.Y. et al.  
Civil Action No.: 19-CV-09646 (JGK)  
Law Dept. No.: 2019-084168-LE

Dear Judge Koeltl:

I am the Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to represent Defendants City of New York and the Board of Education of the City School District of the City of New York, operating as the New York City Department of Education ("DOE"), in the above-referenced matter.

In accord with Your Honor's Individual Practices, I write this letter-motion to respectfully request that Defendants' time to respond to the Complaint be extended from January 2, 2020 to February 13, 2020. This is the first request for an extension in this matter. The extension of time is requested so that this Office may adequately investigate the allegations made in the Complaint. I have spoken with a representative from Plaintiff's counsel's office who informs me that Plaintiff's counsel consents to this extension. Although this Office currently represents only Defendants City of New York and DOE, this Office does not object to the Court granting this extension *sua sponte* with respect to all Defendants.

Accordingly, I respectfully request that the time for Defendants to respond to the Complaint be extended to February 13, 2020.

I thank the Court for its consideration of this request.

Respectfully submitted,  
/s/  
Alana R. Mildner  
Assistant Corporation Counsel

CC: By ECF  
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